

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

DORIAN JOHNSON	∞	CIVIL ACTION NO: 4:15-cv-832
Plaintiff	∞	
	∞	
versus	∞	
	∞	
	∞	JUDGE AUDREY G. FLEISSIG
CITY OF FERGUSON, FERGUSON POLICE	∞	
	∞	
DEPARTMENT, THOMAS JACKSON AND	∞	
	∞	
DARREN WILSON	∞	
Defendants	∞	JURY TRIAL DEMANDED
	∞	

**PLAINTIFF'S FIRST AMENDED COMPLAINT**

NOW COMES, Plaintiff herein, Dorian Johnson (“Johnson” or “Plaintiff”), by and through undersigned counsel, who hereby moves to submit his First Amended Complaint against Defendants, Thomas Jackson, in his individual and official capacity, Darren Wilson, in his individual and official capacity, and the City of Ferguson, via its city council, its agents, servants, and/or employees, supervised, managed, and controlled members of the Ferguson Police Department.

**I.**

Plaintiff by revising paragraph 8 of the Original Complaint to read as follows:

8. Upon information and belief, Defendant City of Ferguson maintains a liability insurance policy that covers Plaintiff's state law tort claims that includes but is not limited to coverage of incidents such as assault, intentional infliction of emotional distress, and alternatively negative infliction of emotional distress. Thus, Defendant City of Ferguson has waived sovereign immunity for tort liability.

Plaintiff reiterates, realleges and reavers each and every other allegation of the original complaint as is fully set forth therein.

**WHEREFORE**, Plaintiffs, Dorian Johnson, prays that defendants Thomas Jackson, Darren Wilson, and the City of Ferguson be served with a copy of this Amended Complaint including the Original Complaint and be duly cited to appear and answer the same, and that after expiration of all legal delays and due proceedings, there be judgment rendered in favor of plaintiff and against all defendants, in an amount that will fully compensate plaintiffs for their damages pursuant to the evidence and in accordance with the law; all sums with legal interest thereon from the date of judicial demand until fully paid, for all costs of these proceedings, and for all general and equitable relief to which she may be entitled.

**CHEHARDY, SHERMAN WILLIAMS  
MURRAY, RECILE, STAKELUM  
& HAYES, LLP**

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- AND-

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ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading has been served upon counsel for all parties via facsimile transmission, electronic mail, hand delivery, or by placing same in the U.S. Mail, postage prepaid and properly addressed, this 29<sup>th</sup> day of March, 2016.

/s/ James M. Williams  
JAMES M. WILLIAMS